

RECEIVED BY MAIL

DEC 07 2020

CLERK, U.S. DISTRICT COURT
DULUTH, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Dr. Steven Audette

Plaintiff(s),

vs.

United States of America * F.B.I. + ATF
CIA Agent Ken White (AKA Kim Wang)
FBI Agent Alan Novis
FBI Agent Matthew Clark
FBI Agent Steven Clark
FBI Agent Michael Ganet
FBI Agent Jason Greene
ATF Agent Daryl Hill

Defendant(s).

~~ATF Agent Daryl Hill~~ Agent Mary Joyce Audette ATF agent Christi Van Werden
(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

Case No. 20-cv-2495 (PJS/DTS)
(To be assigned by Clerk of District Court)

Under Bivens - (8TH Amendment)
Under Tort - (U.S.A as Principal)

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Dr. Steven Audette #47584074

Street Address P.O. Box 6300

County, City PINAL County, FLORENCE

State & Zip Code ARIZONA, 85232

Telephone Number

SCANNED

DEC 08 2020

U.S. DISTRICT COURT DULUTH

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name *United States of America (Dept of Justice)*

Street Address *RFK Dept. of Justice Bldg.*

County, City *950 Penn Ave. N.W.
Washington*

State & Zip Code *D.C. 20530-0001*

b. Defendant No. 2

Name *FBI, Headquarters*

Street Address *935 Penn. Ave. N.W.*

County, City *Washington*

State & Zip Code *D.C. 20535-0001*

c. Defendant No. 3

Name *CIA Agent Ken White (AKA Kim Wang) CIA Hdqrs or F.B.I. Hdqrs*

Street Address *? CIA? or F.B.I. 935 Penn. Ave. N.W.*

County, City *Washington*

State & Zip Code *D.C., 20505 or D.C. 20535-0001*

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

Additional Defendants (Page 1)

2. d Defendant No. 4

Name: FBI Agent Alan Norris (F.B.I. Headquarters)

Street: 935 Penn. Ave. N.W.

City: Washington

State/Zip: D.C. 20535-0001

2. e Defendant No. 5

Name: FBI Agent Matthew Clark (FBI Headquarters) or (U of Minnesota, Mpls)Street: 935 Penn Ave. N.W. or 511 S.E. Washington St. Office, Campus Police (Chief?)City: Washington or MinneapolisState: D.C. 20535-0001 or Minnesota 55455

Note: FBI agent Matthew Clark is the plaintiff's identical twin brother, separated at birth. He may still be an FBI agent, or he may have retired and become the Chief of Campus Police, UofM, Mpls, MN.?

2. f Defendant No. 6

Name: FBI Agent Steven Clark (FBI Headquarters)

Street: 935 Penn Ave. N.W.

City: Washington

State: D.C. 20535-0001

Note: Agent Matthew Clark's older brother

2. g Defendant No. 7

Name: F.B.I. Agent Michael Garret (FBI Headquarters)

Street: 935 Penn Ave. N.W.

City: Washington

State: D.C. 20535-0001

Additional Defendants (Page 2)

2.h Defendant No. 8

Name: FBI Agent Jason Greene (Green?) (F.B.I. Headquarters)
 Street: 935 Penn. Ave. N.W.
 City: Washington
 State: D.C. 20535-0001

2.i Defendant No. 9

Name: "Agent" Mary Joyce Rudette (plaintiff's wife)
 Street: Living in Texas, probably Laredo. Daughter Charity Rios (married to Jaime Rios) may know her whereabouts. Address not known by plaintiff.
~~City~~ City: Laredo
 State: Texas, 78045 *

Note: Defendant's wife personally knows all of the federal agent defendants, and was the coordinator and "go between", between plaintiff and federal agents

2.J Defendant No. 10

Name: ATF Agent Daryl Hill (ATF Headquarters)
 Street: 99 New York Ave. N.E.
 City: Washington
 State: D.C., 20226

2.K Defendant No. 11

Name: ATF Agent Christi Van Warden (ATF-Phoenix)
 Street: 201 E. Washington St. (Suite 940)
 City: Phoenix
 State: Arizona, 85004

Additional Defendants (Page 3)

2. L Defendant No 12

Name : ATF

Street : 99 New York Ave. NE.

City : Washington

State : D.C. 20226

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply. *Multiple, on going Constitutional Amendment #8 violations (for 21 years), and multiple, on going torts under FICA, with United States as principal, (agents acting under color of federal law, with apparent authority). FBI and ATF*
5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (check all that apply)

☒ Defendant(s) reside in Minnesota ☒ Facts alleged below primarily occurred in Minnesota

☒ Other: explain *During 21 year case, much of what happened occurred in Duluth, Eagan, Apple Valley, Princeton, Minneapolis, Bemidji. Evidence of reason Italian mafia came after me may still be in my building at 438 N. 57TH Ave. W. Relatives of my identical twin brother, F.B.I. agent Matthew Clark live in Duluth. Agents Matthew Clark, Steve Clark, their FBI STATEMENT OF THE CLAIM ABOUT FATHER, AND MICHAEL GARRET ARE ALL FROM DULUTH,*

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

(7.1) The United States Government, and the F.B.I. were responsible for the actions of all of their agents. Instead of coming forward and telling the truth, our 21 year clandestine case has been concealed by order of the F.B.I. at my expense. I was made to be the "scapegoat," in order to conceal the truth, which neither the FBI, nor the mafia want revealed. [All AGENTS, FBI AND USA]

(7.2) The FBI, (agent Alan Norris in charge), told us after our case began in Laredo on 8-28-93, that if we went on our own (and borrowed money to survive) they could end it in two years. ... they lied. At the end of two years, the F.B.I. pulled agent Norris (et. al) from our case, leaving me and my family to be killed by the mob. On my wife's orders, we ran from Hollywood, Alabama, to Fish Lake, Cabin #5 at the Eagles' Nest Resort, where she called in another federal agent, CIA agent Ken White (AKA Ken Wang) in New York, and he flew to Minnesota (Duluth or Mpls) to take over our case. My wife had "worked" with then F.B.I. agent Ken White years earlier, beginning in the early 1980's (?). Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☒ [NORRIS, FBI, USA]

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I want a full, public apology by the F.B.I. for what they did to me and my family, and;

\$28 million to Plaintiff for 21 year case, and false imprisonment

\$3 million to Louise Moore

\$1 million to Shawn Warwick

= \$32 million total

Punitive Damages (\$3 million/year)

= \$84 million

+ \$32 million

\$116 million total

Statement of Claim (page 1) Cont.

(7.3) Agent Alan Norris had "worked" with my wife in the past, and according to my wife, he was in love with her. A few weeks after our case began on Monday, August 28th, 1993, F.B.I. agent Alan Norris stated he could end our case by letting the "hit-men" come after me in the apartment (pretending to be asleep), and then "eliminating" the threat. My wife and three daughters left, and I waited to be attacked. Forty five minutes later, my wife and daughters returned, and my wife told me, "Something wasn't right." As it turned out, Agent Norris was setting me up to be killed by the Italian mafia, so he could have my wife. [AGENT NORRIS, FBI, USA]

(7.4) To teach my wife a lesson, Agent Norris ordered my wife to walk on a school running track on Del Mar Blvd in Laredo, to see if she was being followed (this occurred at 10:30 p.m.). After an hour, my wife returned, bruised all over her arms, neck, face, legs, and she stated, "That S.O.B. Norris let 'them' get to me, and didn't stop them for 10-15 minutes. Norris allowed the mob to grab my wife and rough her up, in retaliation for her foiling his plans to eliminate me, and to point out the fact (to us), that he was in charge. We had nobody at the agency we could contact. Agent Norris was it. [AGENT NORRIS, FBI, USA]

(7.5) On many occasions over the 21 year case, I requested that me and my family be allowed into the Fed. Witness Protection Program, (because our situation was unbearable), and each and every time, I was denied because "I had chosen another option, and 'the program' was off of the table." [AGENT WHITE, FBI, USA]

(7.6) Even though the FBI and agent Norris lied to us, we were not allowed to work because we were in hiding, and on the run from the Italian mafia x 3 (three separate groups of organized crime groups after us at one time. In order to survive financially, I was forced into borrowing money from everyone I knew. I would beg the federal government to help us with money, but they refused, claiming that protection was all they would give us. [AGENTS NORRIS, WHITE, USA, FBI]

(7.7) After a "friend" hooked me up to a wealthy patient of his, the amounts of money I was ordered to borrow became much larger and more frequent, up until I had

Statement of claims (page 2) cont.

borrowed over \$2 million dollars, with 99.9% of it going to the federal agents. As it would become apparent, I was being "used" to finance our entire 21 year case, with no recourse or way out. [AGENT WHITE, USA, FBI, AGENT NORRIS]

(7.8) I was not allowed to contact my children, nor return to my chiropractic practice, rental hall, 5 apartments and two clinics (one rented out), and Lake Quest Submarines, another company I was starting up. [AGENTS NORRIS, WHITE, F.B.I., USA]

(7.9) My wife and I had a "number" of children born to us during our 21 year case, and they were all taken away and given to other families to raise because we were told it was too dangerous for them to be with us. I don't even know how many children we have, their locations, or even their names, and nobody will tell me anything about them. [AGENTS NORRIS, WHITE, ALL AGENTS, USA, FBI]

(7.10) My wife and I had a one month old baby girl, shot and killed when the mob ambushed agent white in his motel room, shot him and murdered our daughter. We didn't learn about it for a year and a half after it happened. [AGENT WHITE, USA, FBI]

(7.11) Our three daughters were pulled out of school shortly after our case began (because the mob tried to kidnap them), and were never allowed to go back to school. Our one son who we got to raise, was never allowed to attend school, have friends, play outside etc. His life was destroyed. [ALL AGENTS, USA, FBI]

(7.12) Our son was placed in our grandson's incubator in December of 1999 in St. Paul Ramsey Hospital, St. Paul, MN. because our daughter Hope's baby was dying, and agent white stated that if she lost her baby, we wouldn't be able to control her. She is bipolar and bulimic, and she essentially starved her son to death. Our son's life was ruined, so that the federal agents would not have to worry about controlling our oldest daughter, Hope. Our grandson was removed from the hospital, and has been missing since December of 1999. He is presumably dead. My wife gave birth in the bathroom hospital, unknown to hospital staff. [ALL AGENTS, USA, FBI]

(7.13) I delivered a number of our own children, two of them, Siamese Twins who died when I delivered them in cabin #5, Fish Lake, Eagle's Nest Resort. My wife was

Statement of Claims (page 3) cont.

not allowed to have prenatal care, nor visits to M.O's or hospitals, for fear that the mob would locate us. Our daughter Hope was under a different name, and therefore concealed. [All AGENTS, USA, FBI]

(7.14) For 21 years, the plaintiff and his family were used as bait, and as pawns, to lure out men and women hired by the mob, to identify them, and thereby allowing for their elimination. [All AGENTS, USA, FBI]

(7.15) The plaintiff and his family were constantly placed in unsafe situations (which were in fact, deadly), in order to accommodate the FBI's goals, placing the defendant and his family at risk of injury under deliberate indifference or callous disregard for their safety, creating an unreasonable risk of injury. [All AGENTS, USA, FBI]

(7.16) Beginning in April of 1980 (with the plaintiff's future wife, Joy), federal agents used hypnosis on the plaintiff (without his knowledge), thus forcing him to engage in felony activities which were hidden in the guise of very vivid dreams. Defendant, Joy Audette, confessed this fact to her husband. As "out of the ordinary" as this statement may seem, it is 100% true. [AGENTS NORRIS, WHITE, M.O'S CLARK, Joy, USA, FBI]

(7.17) The FBI knew for years, that the plaintiff was going to be in "trouble" with organized crime for several seasons, yet never informed the plaintiff about his future plight. His situation did not come to light until his case began on Monday, August 28th, 1993 in Laredo, TX. The full truth is still being uncovered. [All AGENTS, USA, FBI]

(7.18) The plaintiff was also made to pay for "activities" carried out by his federal agent wife in the line of her duty, which aided in destroying the plaintiff's life. [All AGENTS, FBI, USA]

(7.19) The plaintiff and his family were coerced and intimidated into continued borrowing of growing sums of money for "the case," and if the plaintiff refused to borrow any more money, the agents would threaten to pull their protection stating, "you and your family will all be dead within one week." [AGENT WHITE, Joy, USA, FBI]

(7.20) The last time plaintiff refused to borrow any more money, Agent White

Statement of Claims (page 4) cont.

took it out on plaintiff's wife, breaking her right arm, and beating her in the face with a glass bottle. [AGENT WHITE, USA, FBI]

(7.21) Agent Ken White would take out any verbal, or attitude resistance from the plaintiff out on the plaintiff's wife, slapping her, putting at her, yelling at her, and intimidating her. We lived under extreme stress and duress for 21 years. [AGENT WHITE, FBI, USA]

(7.22) ²⁰¹³ When Plaintiff's case was compromised by ATF agents in October of ~~2013~~, instead of coming forward and telling the truth, and getting the plaintiff and his family out of trouble, the F.B.I. and all involved agents (including the plaintiff's brother, F.B.I. agent Matthew Clark, and Joy, his wife) all turned their backs on the plaintiff, walked away, and made him the scapegoat for the entire 21 year case. The plaintiff is serving 20 years in prison for wire fraud, even though it's not true. [All AGENTS, FBI, USA]

(7.23) In FBI documents, the "agency" admits that they "may have" located files pertinent to plaintiff's case, but they were destroyed. This after the plaintiff had tried to obtain these F.B.I. records for several years. [FBI, USA]

(7.24) The defendants are guilty of oppression, fraud and malice against the plaintiff and his family for 21 years, and has repeatedly refused to come forward and tell the truth. [All AGENTS, USA, FBI]

(7.25) The defendants forced the plaintiff to borrow money from everyone he knows for 21 years, and has "stuck" him and his wife owing the well over 2 million dollars, even though the vast majority of the borrowed money was borrowed for, and given to the federal agents for our case. This gave the agents the freedom to do what they wanted, without questions concerning the utilization of funds, because the plaintiff was borrowing all required money. [All AGENTS, USA, FBI]

(7.26) For 21 years, agents used excessive physical, or mental coercion to convince the plaintiff to follow his orders, to protect not only himself, but also his wife and his four children [All AGENTS, FBI, USA]

Statement of claims (page 5) cont.

- (7.27) For 21 years, the federal agents, and the agency, knew that the plaintiff and his family were being treated unconstitutionally, but none of them cared as long as their own agenda was fulfilled. In the meantime, the plaintiff and his family's lives were destroyed [All AGENTS, FBI, USA]
- (7.28) For 21 years, there was a constant infliction of emotional distress. The plaintiff, his wife, and his four children suffered severe and extreme emotional distress, every day. This resulted in mental, and emotional injury, and now, long term suffering. [All AGENTS, USA, FBI]
- (7.29) All agents involved, and Principals; U.S. A and FBI showed evil intent, and reckless / Callous indifference to plaintiff's, and his family's rights, as well as those who the plaintiff was forced to borrow money from. These agents, the USA and the FBI, hurt us all on purpose, and it was so clearly egregious, that they must have known it was all likely to hurt the plaintiff and his family. There was evil intent, which destroyed the plaintiff and his family. [All AGENTS, FBI, USA]
- (7.30) The agents, and the principals lied to the plaintiff, telling him that it would be over soon, and when it was, he would be given a huge inheritance which he could use to pay everyone back. It never ended, and instead, the plaintiff was turned into the scapegoat, all agents turned on him, and the U.S. and FBI will not come forward to admit to the truth. [All AGENTS, U.S.A, F.B.I]
- (7.31) The plaintiff was ordered to set up several businesses during the 21 year case, even though it was understood that the mafia would find them, and the businesses would never be able to open. The plaintiff believes this was done to bait the mob and bring them out into the open, at the plaintiff's and his family's expense. [All AGENTS, FBI, USA]
- (7.32) What these agents, the U.S.A. and the FBI put the plaintiff and his family through for 21 years; the lies, the false hope, the stress, the constant fear, their refusal to allow the plaintiff and his family into the federal witness protection program, alienation from all family and friends, the cruel way they were treated, for 21 years cannot be underestimated or simply explained away. [All AGENTS, FBI, USA, ATF]

Statement of Claims (Page 6) Cont.

(7.33) ATF agents did not investigate the truth, nor discover the FBI files pertinent to the truth as the plaintiff knew it to be. They merely used circumstantial evidence, ignored anything the plaintiff told them, and went after a conviction/arrest at the expense of the truth and justice [All AGENTS, U.S.A, FBI, ATF]

(7.34) ATF agents tampered with witnesses, in order to turn them against the plaintiff, and ensure an arrest and conviction [ATF, FBI, U.S.A, AGENT HILL, VAN WARDEN]

(7.35) ATF agents illegally, immorally, and unethically question the plaintiff's 13 year old, underage son, without his parents' consent. This was illegal.

(7.36) [ATF, USA, FBI, All AGENTS, ATF AGENTS]

Charges Against All agents and USA and FBI8TH Amendment (Bivens)FICA (Tort USA, FBI)

- | | |
|--|--|
| 1) failure to provide safe environment | 1) Abuse of Power |
| 2) placing plaintiff in unsafe " " | 2) Inflict unnecessary psych anguish |
| 3) failure to act (report Const. Violations) | 3) Place in unsafe situation |
| 4) Deliberate Indifference | 4) Neg. to use reasonable care |
| 5) Cruel and Unusual Punishment | 5) Assault/Battery on wife to control/intimidate |
| 6) Lack of Reasonable safety | 6) Intentional inflict of emotional distress |
| 7) Placing plaintiff at obvious risk | 7) Conceal the truth |
| 8) disregard for excessive risk | 8) Turn Plaintiff into scapegoat |
| 9) Malice | 9) Malice |
| 10) Fraud | 10) Fraud |
| 11) Oppression | 11) Oppression |
| 12) Estab. Criminal Enterprise | 12) Dangerous Conditions |
| 13) Abandonment of Protection | 13) Expose to unreasonable foreseeable risk |
| 14) Psychological Harm | 14) Loss of daughter |
| 15) Risk of Injury or Death | 15) Loss of grandson |
| | 16) Loss of other children |
| | 17) Destruction of our lives. |

Statement of Claims (Page 7) cont.

Charges listed are by no means exhaustive. The plaintiff, his wife and their four children, were at the mercy of these federal agents (and the principals - USA & FBI) for 21 years. The plaintiff's life and family have all been destroyed, and he is serving 20 years in prison. There has been 29+ years, and the plaintiff is still paying for the actions (or lack of actions) of these federal agents who were suppose to protect the plaintiff and his family. Instead, they were all used as bait and to fend their government operation. Plaintiff and family were used for 21 years, destroyed, and then discarded.

I declare, that the present document is true and accurate to the best of my knowledge, understanding and recollection under penalty of perjury.

Signed, Dr. Steven Rudette this 23rd day of November, 2020

Signed this 23rd day of November 20

Signature of Plaintiff Dr. Steven Rudette #47584074

Mailing Address #47584074
CAC (infirmary)
P.O. Box 6300
Tulsa, AZ

Telephone Number 85232

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.